



Dr. Ray Timothy
Utah Education and Telehealth Network
University of Utah
101 Wasatch Drive
Salt Lake City, UT 84112

Date: 3/2/2018

RE: Request for Waiver of Implementation Deadline for Fiber Special Construction Utah Education and Telehealth Network—Daggett County Schools Fiber Project (BEN 150246; CC Docket No. 02-06; CC Docket No. 13-184)

Dear Dr. Timothy:

STRATA Networks is excited about the opportunity to bring fiber-optic facilities to Daggett County, Utah, in order to deliver Gigabit-Ethernet services to Manila High School (Manila, Utah) and Flaming Gorge Elementary (Dutch John, Utah). The Utah Education & Telehealth Network (UETN) has contracted with STRATA Networks, via RFP process, to build, operate, and maintain fiber infrastructure and services to these two schools. As in the past, STRATA is committed to our relationship with UETN and looks forward to the opportunity to work together in this endeavor.

To our understanding, current delays in funding approval are related to a request from UETN to USAC (and the FCC) for an extension to the construction timeline. UETN has notified us that this request for a timeline extension is now under petition for appeal with the Wireline Competition Bureau of the FCC. In order to support the request for a timeline extension, we have provided a summary of the construction conditions of this project, which we feel are unique and challenging to the point where the requested extension is necessary and appropriate. Please see a summarized outline of those details below:

- **Construction Season**

As the proposed route traverses over a mountain pass in Utah's Uinta range of the Rocky Mountains, with elevations reaching over 8,500 feet, the annual construction season for much of the route is very short, as it is often covered with snow starting as early as September/October and often persisting through the month of May. Because of this, STRATA was expecting to begin construction in March/April of this year, in the lower elevation areas and then proceed to higher elevation areas during the warmer months of this year in order to take advantage of the best and most productive construction months. However, it is anticipated that 2 full construction seasons will be required in order to complete the high elevation portions of the project and STRATA intends to utilize the non-optimal months (colder months) to complete construction required in the lower elevation areas of the project. Delays in funding will likely shorten the construction season for much of the route, causing additional delays in the overall timeframe for completion.

- **Construction Methods/Challenges**

As mentioned above, the proposed route for construction traverses over a mountain pass in Utah's Uinta range of the Rock Mountains. This area is rugged and poses extreme challenges for excavation and infrastructure placement projects such as this proposed fiber-optic route.

STRATA estimates that roughly 40% of the route will require rock excavation. This excavation is done with a large rock wheel saw which cuts an 8"-14" wide slot through the solid rock encountered along much of the route. After the saw has cut the slot through the rock, a large plow follows behind placing the necessary fiber conduit at the bottom of the trench.



The other 60% of the project is also expected to contain significant amounts of fractured rock as well. For those portions of the job, we will attempt to plow the conduit first, and bring in the rock saw as needed for any conditions beyond the capabilities of the plow alone.

There is also a section of aerial construction required for this project, which must be done during good weather in order to avoid snow and accommodate access to the poles.

Other challenging portions of the job include placing infrastructure across a large bridge, through and across Flaming Gorge Dam, as well as using directional drilling (boring) to avoid several identified environmentally and historically sensitive areas and to provide underground road crossings as necessary for the project.

Although the route is planned to only impact previously disturbed areas within the roadway corridor, STRATA also intends to clean up and remediate the construction pathway in order to minimize impact to the roadway and surrounding environment.

- **Materials Availability**

In projects of this type, some of the key materials can have lead times that can be difficult to manage. STRATA is hesitant to invest in the materials, due to the large quantities needed for this project, without the funding being fully approved for the project. Because of this, once the project is approved, STRATA will be subject to the lead times of all associated materials before the project can commence and consequently be completed. By way of example, conduits are currently experiencing lead times of up to 6-8 weeks and fiber optic cables are currently experiencing lead times of up to 10 months.

Having mentioned these concerns, STRATA is still hopeful and optimistic regarding this project and committed to its completion once the funding is approved and the timeline extension period is granted. Please feel free to contact our excellent support team for this project (primary contact listed below) with any questions or additional comments. Please let us know if there is anything we can do to assist in your communications with the FCC, the Wireline Competition Bureau, and/or the Universal Service Administrative Company (USAC) in obtaining necessary approvals for funding and timeline for construction.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Goodrich", enclosed within a blue oval.

Jeff Goodrich
Chief Operations Officer
STRATA Networks

Primary Project Contact

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